

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re:	:
	: Case No. 15-10243 (MG)
TS EMPLOYMENT, INC.	:
	: Chapter 11
	:
Debtors.	:
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**AMENDED STIPULATION AND ORDER TOLLING
APPLICABLE STATUTES OF LIMITATIONS WITH
RESPECT TO CLAIMS AGAINST KOSSOFF & KOSSOFF LLP**

James S. Feltman, not individually but solely in his capacity as Chapter 11 trustee (“Trustee”) of the bankruptcy estate of TS Employment, Inc. (“TSE”), Case No. 15-10243 (MG), and, on the other hand, Kossoff & Kossoff LLP, and Irwin Kossoff and Joseph Silverstein (the “Services Partners” and collectively with Kossoff & Kossoff LLP, “Kossoff,” and Kossoff together with the Trustee, the “Parties” or each a “Party”), hereby agree and stipulate:

WHEREAS, on February 2, 2015 (the “TSE Petition Date”), TSE filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101–1532 (the “Bankruptcy Code”) in the United States Bankruptcy Court for the Southern District of New York (the “Bankruptcy Court”); and

WHEREAS, on July 23, 2015 (the “CRS Petition Date”), Corporate Resource Services, Inc. (“CRS”), and CRS’s subsidiaries Accountabilities, Inc., Corporate Resource Development Inc., Diamond Staffing Services, Inc., Insurance Overload Services, Inc., Integrated Consulting Services, Inc., The CRS Group, Inc. and TS Staffing Services, Inc. (the “CRS Subsidiaries,” together with CRS, the “CRS Debtors”), filed voluntary chapter 11 petitions in the United States Bankruptcy Court for the District of Delaware; and

WHEREAS, on August 21, 2015 the CRS Debtors' bankruptcy cases were transferred to the Bankruptcy Court, where CRS's case was assigned Case No. 15-12329; and

WHEREAS, the Trustee was appointed the chapter 11 Trustee of TSE's bankruptcy estate and the CRS Debtors' bankruptcy estates; and

WHEREAS, on January 17, 2017, the Bankruptcy Court entered a stipulation and order tolling applicable statutes of limitations with respect to the Trustee's claims against Kossoff in the TSE chapter 11 case ("TSE Stipulation"), Dkt. No. 229; and

WHEREAS, on June 21, 2017, the Bankruptcy Court entered a stipulation and order tolling applicable statutes of limitations with respect to the Trustee's claims against Kossoff in the CRS Debtors' chapter 11 cases ("CRS Stipulation"), Dkt. No. 635 in CRS's case;

NOW THEREFORE, the Parties stipulate and agree:

1. Paragraph 1 of the TSE Stipulation shall be superseded and replaced with the following: "The running of any applicable statute of limitations under sections 108, 546(a) and 549(d) of the Bankruptcy Code, and all other time limitations or time-based defenses concerning any claim or cause of action against Kossoff which might be asserted by the Trustee on behalf of the Debtor's estates under or through various provisions of the Bankruptcy Code or non-bankruptcy law, including, without limitation, any of the Claims, is hereby tolled from the date of this Stipulation up to and including July 2018 (the "Tolled Period").

2. Except as amended by this amended Stipulation and Order, the remaining terms of the TSE Stipulation remain in full force and effect.

IN WITNESS OF THE FOREGOING, the parties have executed, or caused to be executed,
this Stipulation as of the date first written above.

Dated: New York, New York JAMES S. FELTMAN
February 15, 2018 Not Individually But Solely in His Capacity as
Chapter 11 Trustee

By His Attorneys,
JENNER & BLOCK LLP
By:

/s/ Vincent E. Lazar

Vincent E. Lazar
353 N. Clark St.
Chicago, IL 60654

Dated: New York, New York KOSSOFF & KOSSOFF LLP
February 15, 2018 AND THE SERVICES PARTNERS

By Their Counsel,
LEWIS BAACH PLLC
KAUFMANN MIDDLEMISS
By:

/s/ Jason H. Berland

JASON H. BERLAND
The Chrysler Building
405 Lexington Avenue, 62nd Floor
New York, New York 10174
(212) 826-7001

IT IS SO ORDERED.

Dated: February 20, 2018
New York, New York

/s/ Martin Glenn
MARTIN GLENN
United States Bankruptcy Judge